

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JANE DOE 3,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 1:19-cv-03843-WMR
)	
ESSEX, LLC; et al.,)	
)	
Defendants.)	
_____)	

NOTICE OF VIDEO DEPOSITION OF JOY VALERIO

TO: Ms. Joy Valerio
c/o Michael Baumrind
BONDURANT, MIXSON & ELMORE, LLP
1201 West Peachtree Road N.W.
Suite 3900
Atlanta, GA 30309

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, Defendants Extended Stay America, Inc., ESA Management, LLC, and HVM, L.L.C. (hereinafter “ESA Defendants”) will take the deposition of witness **JOY VALERIO** for purposes of discovery, cross-examination of a witness, and all other purposes allowable under the Federal Rules of Civil Procedure on **Friday, January 13, 2023**, beginning at **10:00 a.m. EDT** at the Brunswick-Glynn County Public Library, located at 208 Gloucester Street, Brunswick, GA 31520, Meeting Room 2.

The deposition shall be taken by a Certified Court Reporter duly authorized by law to administer oaths and transcribe testimony and recorded on video.

According to Fed. R. Civ. P. 30(d)(1), “[t]he court must allow additional time consistent with Rule 26(b)(1) and (2) if needed to fairly examine the deponent or if the deponent, another person, or any other circumstance impedes or delays the examination.” The ESA Defendants specifically reserve the right to further depose Joy Valerio. If the deposition is not completed on the date indicated, it shall continue from day to day and time to time thereafter until completed.

Respectfully submitted this 10th day of January, 2023.

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC

/s/ *Patrick Moore*

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 5.1 AND 7.1D

Pursuant to Local Rules 5.1 and 7.1D of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court was computer-processed, prepared with a top margin of not less than one and one-half inches and a left margin of not less than one inch, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: January 10, 2023.

/s/ *Patrick Moore*

Patrick B. Moore

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing *Notice of Deposition of Joy Valerio* has been electronically filed/served with the Court via the Clerk's electronic filing system, which will automatically notify all counsel of record.

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Respectfully submitted this 10th day of January, 2023.

WEINBERG, WHEELER,
HUDGINS, GUNN & DIAL, LLC
/s/ *Patrick Moore*
Patrick B. Moore